

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

MMAS RESEARCH LLC, a Washington
limited liability company,

Plaintiff,

v.

THE CHILDREN'S HOSPITAL
CORPORATION, *et al.*,

Defendants.

Case No. 1:24-cv-12108-DHC

**PLAINTIFF'S MOTION TO ENLARGE DEADLINE TO FILE MOTION TO AMEND
THE COMPLAINT**

NOW COMES Plaintiff MMAS Research LLC ("Plaintiff") in the above-captioned matter and respectfully requests that the Court extend the deadline for Plaintiff to file a motion for leave to file a second amended complaint.

In support of this motion, Plaintiff states that this Court previously set a deadline of January 15, 2026, for motions seeking leave to add new parties or amend the pleadings. Plaintiff has finalized its motion to amend and memorandum in support but is trying to effectuate service on newly added defendants in accordance with Local Rule 15.1, which requires the motion to amend be served on the new parties at least fourteen (14) days in advance of filing the motion. Plaintiff can effectuate service on the anticipated new parties by the January 15, 2026, deadline, but will not be able to file the motion by that date because of the 14-day waiting period. The brief extension will allow Plaintiff to comply with the Local Rules of this Court and is neither an unreasonable delay nor is it meant to prejudice any party.

WHEREFORE, Plaintiff respectfully requests that this Court enter an Order granting the Motion and extending Plaintiff's time to file a motion seeking leave to amend to January 29, 2026.

Respectfully submitted,

MMAS Research LLC,
By its Attorneys,

/s/ A. Neil Hartzell

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Dated: January 14, 2026

CERTIFICATE OF GOOD FAITH CONFERENCE

Pursuant to Local Rule 7.1, I hereby certify that counsel for Plaintiff has conferred with counsel for Defendants in a good faith attempt to resolve or narrow the issue.

/s/ Ronald D. Coleman

Ronald D. Coleman

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing to be served upon all counsel of record via the Electronic Case Filing system on the date of filing

/s/ A. Neil Hartzell

A. Neil Hartzell